

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-cv-60984-Augustin-Birch

[Consent Case]

MELINDA MICHAELS,

Plaintiff,

v.

SEAWATER PRO LLC, and
MICHAEL SPANOS A/K/A MIKE SPANOS,

Defendants.

**JOINT MOTION FOR MUTUAL EXTENSIONS OF TIME
TO RESPOND TO MOTIONS FOR SUMMARY JUDGMENT**

Plaintiff Melinda Michaels, Defendants SeaWater Pro LLC and Michael Spanos, by and through their undersigned counsel, respectfully submit this Joint Motion for mutual extensions of time through July 25, 2025, to respond to each other's Motions for Summary Judgment (ECF No. 56 and 57) and in support state the following:

1. On June 27, 2025, Plaintiff Melinda Michaels filed her Motion for Summary Judgment (ECF No. 56), and Defendant's SeaWater Pro LLC, and Michael Spanos filed their Motion for Summary Judgment (ECF No. 57).
2. Respective responses to each Summary Judgment are due on July 11, 2025.
3. This week is a holiday week, with July 4th falling on Friday.
4. Counsel for Plaintiff will be out of town the week of July 7 – 11, 2025, and Counsel for Defendants will be out of town the week of July 14-18, 2025.

5. The Parties have conferred in good faith and have agreed to mutually extend each other's respective response deadline through July 25, 2025 given each other's immediate travel plans.
3. Federal Rule of Civil Procedure 6(b)(1) states that when a deadline exists for a party to act, the court "for cause shown may at any time in its discretion with or without motion or notice order the period enlarged if request thereof is made before the expiration of the period originally prescribed or as extended by previous order." The requested extensions are required due to the unavailability of counsel. Moreover, as indicated by the joint nature of this motion, the Parties have conferred and are in agreement regarding the requested extensions.
4. For these reasons, the Parties respectfully request that the Court enter the attached proposed order granting the Parties' Joint Motion for mutual extensions, let all other deadlines remain, and grant such other further relief as the Court deems necessary.

WHEREFORE, the parties respectfully request the Court grant mutual extensions to respond to Motions for Summary Judgment through July 25, 2025.

Respectfully Submitted,

Dated: July 1, 2025.

/s/Dillon S. Cuthbertson

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